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December 9, 2022

VIA EMAIL

The Honorable Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Elliott v. Donegan, No. 1:18-cv-05680-LDH-SJB (E.D.N.Y.)**

Dear Judge Bulsara:

On behalf of Defendant Moira Donegan, we submit this letter in accordance with Your Honor's Individual Practices Rule II.A to respectfully request an extension of the overall case schedule to accommodate the forthcoming second mediation conference, which is now scheduled for January 27, 2023. (Dec. 9, 2022 Docket Entry.) We have conferred with counsel for Plaintiff Stephen Elliott, who joins in this request.

The Court previously granted the parties' request for an extension of the schedule to accommodate the second mediation conference, then scheduled for November 29, 2022, given the parties' desire to focus on settlement efforts and avoid the unnecessary time and expense of engaging in discovery. (ECF 108; Nov. 3, 2022 Docket Entry.) Those same reasons warrant a further extension of the schedule, and the parties respectfully request an extension of 45 days to all existing dates. Under this proposal, the new deadlines would be as follows:

- February 17, 2023 – substantial completion of all document discovery;
- March 22, 2023 – serve final written discovery requests;
- April 21, 2023 – completion of all fact discovery;
- May 19, 2023 – expert reports;
- June 30, 2023 – rebuttal expert reports;
- July 28, 2023 – completion of all discovery; and
- February 23, 2024 (or another date convenient for the Court) – status conference.

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We very much appreciate Your Honor continuing to assist the parties in their effort to resolve this case through a reasonable settlement.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'G. Tenzer', with a stylized flourish at the end.

Gabrielle E. Tenzer